

BEFORE THE
Federal Communications Commission
Washington, DC 20554

In the Matter of

Geographic Partitioning and Spectrum
Disaggregation by Commercial Mobile
Radio Services Licensees

WT Docket No. 96-148

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COMMENTS OF
BENBOW P.C.S. VENTURES, INC.

Benbow P.C.S. Ventures, Inc. ("Benbow"),¹ by its attorneys, hereby submits these comments in the above-captioned docket.² Benbow fully supports the Commission's decision to allow geographic partitioning and spectrum disaggregation by all broadband Personal Communications Services ("PCS") licensees. Benbow submits that these capabilities should be extended to other wireless service providers including, specifically, narrowband PCS licensees.

In the *Further Notice*, the Commission is seeking comment on whether to allow partitioning and disaggregation by "cellular, GWCS and any other services that are licensed on a geographic area basis, or in spectrum blocks of sufficient size to make

¹ Benbow is a female-owned, small business which obtained two licenses (File Nos. 00035-CL-L-95 and 00041-CL-L-95) in the Commission's regional narrowband PCS auction.

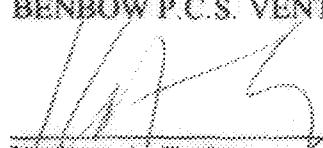
² *In re Geographic Partitioning and Spectrum Disaggregation by Commercial Mobile Radio Services Licensees, Implementation of Section 257 of the Communications Act - Elimination of Market Entry Barriers, Report and Order and Further Notice of Proposed Rulemaking*, FCC 96-474 (December 20, 1996) ("Further Notice").

disaggregation practical.³ Benbow submits that the rationale underlying the Commission's decision to allow geographic partitioning and spectrum disaggregation by all broadband PCS licensees is equally applicable with respect to other wireless licensees, including narrowband PCS. As in the broadband PCS context, partitioning and disaggregation would provide other wireless licensees flexibility to tailor their service offerings to meet market demands.⁴ Partitioning and disaggregation will also help alleviate barriers faced by small businesses, rural telephone companies and minority and female-owned businesses by creating smaller, less capital-intensive licenses.⁵ For the same reasons, narrowband PCS and other wireless carriers should be given authority to partition and disaggregate their licenses.

Respectfully Submitted,

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³ *Id.* at para. 94. (emphasis added) The Commission acknowledges in the *Further Notice* that it presently permits or is seeking comment on geographic partitioning and disaggregation for most wireless services, making specific reference to Multipoint Distribution Service ("MDS"), General Wireless Communications Service ("GWCS"), 800 MHz Specialized Mobile Radio ("SMR"), paging, 220 MHz, 900 MHz SMR, 38 GHz fixed point-to-point microwave and the Wireless Communications Service ("WCS"). *Id.* at para. 93.

⁴ *Id.* at paras. 2 and 94.

⁵ *Id.*